



Decision _____

FILED

04/04/23

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A2304004

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF
CALIFORNIA**

Application of Green Power Institute for award of intervenor compensation for substantial contributions to Resolution Numbers SPD-7, SPD-8, SPD-9, SPD-11, and SPD-12.	A.23-04-0xx (Filed April 4, 2023)
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**INTERVENOR COMPENSATION CLAIM OF GREEN POWER INSTITUTE
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF GREEN
POWER INSTITUTE**

NOTE: After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD and supporting EXCEL spreadsheet to the Intervenor Compensation Program Coordinator at lcompcoordinator@cpuc.ca.gov.

Intervenor: Green Power Institute	For contribution to Resolutions SPD-7, SPD-8, SPD-9, SPD-11, and SPD-12	
Claimed: \$ 115,758	Awarded: \$	
Exec. Director: Rachel Peterson	Assigned ALJ: None Assigned	
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).		
Signature:		
Date: April 4, 2023	Printed Name:	Gregg Morris

PART I: PROCEDURAL ISSUES
(to be completed by Intervenor except where indicated)

A. Brief description of Decision:	SPD-7, Ratifying Action of OEIS on 2023 WMP Compliance Guidelines SPD-8, Ratifying Action of OEIS on Liberty Utility's 2022 WMP Update SPD-9, Ratifying Action of OEIS on PG&E's 2022 WMP Update SPD-11, Ratifying Action of OEIS on BVES's 2022 WMP Update SPD-12, Ratifying Action of OEIS on PacifiCorp's 2022 WMP Update
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	None	
2. Other specified date for NOI:	None	
3. Date NOI filed:	Concurrent with this Request for Compensation (see Attachment 15).	
4. Was the NOI timely filed?		
Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	R.20-05-002	
6. Date of ALJ ruling:	November 20, 2020	
7. Based on another CPUC determination (specify):	D.23-02-015	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		

¹ All statutory references are to California Public Utilities Code unless indicated otherwise.

Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.20-05-002	
10. Date of ALJ ruling:	November 20, 2020	
11. Based on another CPUC determination (specify):	D.23-02-015	
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	SPD-12	
14. Date of issuance of Final Order or Decision:	February 24, 2023	
15. File date of compensation request:	April 4, 2023	
16. Was the request for compensation timely?		

C. Additional Comments on Part I: (use line reference # as appropriate)

#	Intervenor’s Comment(s)	CPUC Discussion

PART II: SUBSTANTIAL CONTRIBUTION
(to be completed by Intervenor except where indicated)

A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059): (For each contribution, support with specific reference to the record.)

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
	(Please note that Attachment 2 includes a list of issue areas and GPI Pleadings relevant to this Claim.)	
1. 2023 WMP Compliance Guidelines. The GPI made substantial contributions to Resolution SPD-7 and the OEIS WMP Compliance Process document it approves by providing	Resolution SPD-7 In the proposed Compliance Process, Energy Safety reiterates its existing objectives for assessing compliance. The proposal is reorganized from the prior focus on annual and ongoing compliance processes, and instead	

<p>detailed analysis and insights into the issues of restructuring the WMP compliance process in our 10/26/22 Comments. OEIS adopted many of our suggestions, and in instances where our positions were not adopted, we made substantial contributions by enriching the record underlying the decisions.</p>	<p>discusses five components that Energy Safety considers in assessing WMP compliance (inspections, the electrical corporation’s annual report on compliance, the independent evaluator’s annual report on compliance, audits, and Energy Safety’s annual report on compliance). [SPD-7, pg. 2.]</p> <p>Pleadings</p> <p>Our comments include structural and foundational/conceptual topics on the WMP Guidelines overall, by WMP plan section, and for the updated Maturity Model. Comments address the following topics:</p> <ul style="list-style-type: none"> • Filing deadlines should follow CPUC counting rules • GPI recommends migrating to digitized maps on publicly accessible platforms • GPI recommends establishing a standardized Tracking ID format • Section 1.2.3: Add a data table with estimated rate increase for a defined residential customer profile. • Section 4.3: Vague language continues to leave substantial room for individual utility interpretation of cost-effective risk reduction. • Clarify reporting requirements in Section 4.3 • Section 5. Overview of the Service Territory - recommendations • Section 6 Risk Methodology and Assessment – recommendations and packaging model and sub-model descriptions based on WMP application. 	
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	<ul style="list-style-type: none"> • Section 7 Wildfire Mitigation Strategy Development – recommendations • Section 8 Wildfire Mitigation – recommendations • Expand Section 8.2.3.1 Fuels Management to include quantitative reporting, target planning, and disposal pathway. • Appendix A: Include additional terminology definitions • Appendix B should be restructured to facilitate WMP Review • Reduce the number of header levels to the maximum extent possible and separate the guidance from the WMP template structure. [Structural] • Maturity Model recommendations. <p>[GPI Comments, 10/26/22, pgs. 1-2.]</p>	
<p>2. Review of 2022 Liberty Utilities’ WMP Update.</p> <p>The GPI made substantial contributions to Resolution SPD-8 by performing a detailed analysis of Liberty Utilities’ 2022 WMP update, and providing the Commission with the results of our analysis and our recommendations for fixing deficiencies in the plan before the end of the first WMP three-year cycle, and in preparation for the coming cycle. OEIS adopted many of our suggestions in responding to Liberty Utilities, and in drafting their decision to accept</p>	<p>Resolution SPD-8</p> <p>Comments on the WMPs were due on August 15, 2022 and reply comments were due on August 22, 2022. Comments were provided by the Green Power Institute (GPI) and the Public Advocates Office at the CPUC (Cal Advocates). Energy Safety evaluated these comments, concurred with some comments, and in some instances incorporated stakeholder input into the decision. [Res. SPD-8, pg. 4.]</p> <p>Pleadings</p> <p>The GPI performed a review of the SMJUs’ 2022 WMP Updates with a general focus on risk modeling and the reduction of green waste from</p>	

<p>the update, which SPD-8 ratifies. In instances where our positions were not adopted, we made substantial contributions by enriching the record underlying the decision.</p>	<p>vegetation management mitigations. Our comments focus on PacifiCorp and Liberty’s 2022 WMPs, and secondarily address issues in the Bear Valley Electric Service (BVES) WMP. This is not, however, a reflection on the importance of holding BVES and their Wildfire Mitigation Plan to equally high standards. Based on our review we have substantial concerns regarding PacifiCorp’s 2020–2021 performance and 2022 work plan and associated costs. We recommend issuing PacifiCorp a revision notice that addresses the disconnect between past versus proposed performance and costs. We provide further comments on the following topics [only bullet points pertinent to Liberty included]:</p> <ul style="list-style-type: none"> • Equivocating language is a persistent issue in the SMJU WMPs. • Liberty and BVES spending stabilized along with program targets. • SMJU’s WMP-associated electric bill increases are much higher than IOU WMP customer increases. • SMJU lessons learned assessments are a plan weakness that suggests high-level directional planning for the WMP is somewhat uncertain. • SMJUs should clearly describe how they are working with other utilities to leverage existing data and ongoing studies relevant to their WMP research efforts. • The SMJUs are relying heavily on the HFTD maps to guide risk mitigation planning efforts. They are also failing to analyze 	
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	<p>more granular risk and/or to use more granular risk findings to inform updates to the HFTD.</p> <ul style="list-style-type: none"> • SMJUs may be oversimplifying their assessment of climate change effects on granular wildfire risk. • SMJUs fail to include tree species data in their risk modeling or vegetation management considerations. • SMJUs have not yet developed comprehensive or transparent quantification methods for wildfire consequence and should be required to do so in the next 3-year WMP cycle. • Comments on Liberty's wildfire risk modeling. • Risk modeling and assessments do not include tree species. • A standard fire spread model duration should be set for wildfire consequence modeling and quantification. GPI supports a 24 h duration to encompass a full diurnal cycle. • Liberty's QA/QC inspection rate of 0.5 percent, is one tenth of the QA/QC performed by PacifiCorp and BVES (5 percent). • Liberty should accelerate their expulsion fuse replacement program and improve the prioritization method. • Liberty should explain whether and how it considers alternate pole materials or protections in high fire risk locations. 	
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	<ul style="list-style-type: none"> • Liberty and PacifiCorp do not adequately take into account ingress or egress routes in their risk modeling or Grid Design and System Hardening plan. • All SMJUs should have a specific CC maintenance program that takes into consideration CC specific failure modes. • Liberty should provide transparency in their WMP regarding whether Rule 20 undergrounding projects are funded by local citizens or ratepayers at large. • Liberty's fuels management tables should be adopted by all utilities as the first-step and current best practice for reporting on vegetation residues produced during vegetation management work. • SMJUs should explain how they schedule and perform additional inspections and vegetation management in wildfire impacted areas. <p>[GPI Comments, 6/20/22, pgs. 1-3.]</p>	
<p>3. Review of 2022 PG&E WMP Update.</p> <p>The GPI made substantial contributions to Resolution SPD-9 by performing a detailed analysis of PG&E's 2022 WMP update, response to the OEIS Revision Notice, and the resulting PD regarding accepting the document, and providing the Commission with the results of our analysis and our recommendations for</p>	<p>Resolution SPD-9</p> <p>On October 6, 2022, Energy Safety released a draft decision approving PG&E's 2022 WMP update for public comment.⁹ The comment period ended on October 26, 2022, with comments received from GPI, PG&E, and Cal Advocates. The comments generally call for additional accountability and monitoring of specific issues, such as improvements to inspection quality and timely reduction of PG&E's repair backlog. However, none of the</p>	

<p>fixing deficiencies in the plan before the end of the first WMP three-year cycle, and in preparation for the coming cycle. OEIS adopted many of our suggestions in responding to PG&E, and in drafting their decision to accept the update, which SPD-9 ratifies. In instances where our positions were not adopted, we made substantial contributions by enriching the record underlying the decision.</p>	<p>comments called for a rejection of the plan. Reply comments were submitted by PG&E on November 7. PG&E addressed recommendations suggested by GPI and Cal Advocates regarding repair backlog, asset inspections, and the risk modeling and costs of undergrounding, noting that Energy Safety's required improvements for the 2023 WMP would resolve these issues. After evaluating the comments, Energy Safety issued its final decision approving PG&E's WMP on November 10, 2022. [Res. SPD-9, pgs. 4-5.]</p> <p>Pleadings</p> <p>GPI generally supports the Draft decision on PG&E's 2022 Wildfire Mitigation Plan Update. We provide the following recommendations for inclusion in the final Decision. [GPI Comments, 10/26/22, pg. 1.]</p>	
<p>4. Review of 2022 BVES WMP Update.</p> <p>The GPI made substantial contributions to Resolution SPD-11 by performing a detailed analysis of BVES' 2022 WMP update, and providing the Commission with the results of our analysis and our recommendations for fixing deficiencies in the plan before the end of the first WMP three-year cycle, and in preparation for the coming cycle. OEIS adopted many of our suggestions in responding to BVES, and in drafting their decision to accept the update, which SPD-11 ratifies. In instances where our positions were not adopted, we made substantial contributions by</p>	<p>Resolution SPD-11</p> <p>BVES submitted its WMP Update for 2022 on May 06, 2022 and provided an overview of the WMP in a workshop overseen by Energy Safety on May 16, 2022. Comments on the WMPs were due on June 20, 2022 and reply comments were due on June 27, 2022. Comments were provided by the California Department of Fish and Wildlife (CDFW), Green Power Institute (GPI) and the Public Advocates Office at the CPUC (Cal Advocates). Energy Safety evaluated these comments, concurred with some comments, and in some instances incorporated stakeholder input into the decision. [Res. SPD-11, pg. 4.]</p> <p>Pleadings</p> <p>The GPI performed a review of the SMJUs' 2022 WMP Updates with a</p>	

<p>enriching the record underlying the decision.</p>	<p>general focus on risk modeling and the reduction of green waste from vegetation management mitigations. Our comments focus on PacifiCorp and Liberty's 2022 WMPs, and secondarily address issues in the Bear Valley Electric Service (BVES) WMP. This is not, however, a reflection on the importance of holding BVES and their Wildfire Mitigation Plan to equally high standards. Based on our review we have substantial concerns regarding PacifiCorp's 2020–2021 performance and 2022 work plan and associated costs. We recommend issuing PacifiCorp a revision notice that addresses the disconnect between past versus proposed performance and costs. We provide further comments on the following topics [only bullet points pertinent to BVES included]:</p> <ul style="list-style-type: none"> • Equivocating language is a persistent issue in the SMJU WMPs. • Liberty and BVES spending stabilized along with program targets. • SMJU's WMP-associated electric bill increases are much higher than IOU WMP customer increases. • BVES does not distinguish between top-risk circuits and percent of work completed therein in their Program Targets tables. • SMJU lessons learned assessments are a plan weakness that suggests high-level directional planning for the WMP is somewhat uncertain. • SMJUs should clearly describe how they are working with other 	
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	<p>utilities to leverage existing data and ongoing studies relevant to their WMP research efforts.</p> <ul style="list-style-type: none"> • The SMJUs are relying heavily on the HFTD maps to guide risk mitigation planning efforts. They are also failing to analyze more granular risk and/or to use more granular risk findings to inform updates to the HFTD. • SMJUs may be oversimplifying their assessment of climate change effects on granular wildfire risk. • SMJUs fail to include tree species data in their risk modeling or vegetation management considerations. • SMJUs have not yet developed comprehensive or transparent quantification methods for wildfire consequence and should be required to do so in the next 3-year WMP cycle. • Comments on BVES's wildfire risk modeling. • Risk modeling and assessments do not include tree species. • A standard fire spread model duration should be set for wildfire consequence modeling and quantification. GPI supports a 24 h duration to encompass a full diurnal cycle. • BVES should explore opportunities to contract with SCE for wildfire planning and/or mitigation services. • All SMJUs should have a specific CC maintenance program that takes into 	
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	<p>consideration CC specific failure modes.</p> <ul style="list-style-type: none"> • SMJUs should explain how they schedule and perform additional inspections and vegetation management in wildfire impacted areas. <p>[GPI Comments, 6/20/22, pgs. 1-3.]</p>	
<p>5. Review of 2022 PacifiCorp WMP Update.</p> <p>The GPI made substantial contributions to Resolution SPD-12 by performing a detailed analysis of PacifiCorp's 2022 WMP update, and providing the Commission with the results of our analysis and our recommendations for fixing deficiencies in the plan before the end of the first WMP three-year cycle, and in preparation for the coming cycle. OEIS adopted many of our suggestions in responding to PacifiCorp, and in drafting their decision to accept the update, which SPD-12 ratifies. In instances where our positions were not adopted, we made substantial contributions by enriching the record underlying the decision.</p>	<p>Resolution SPD-12</p> <p>PacifiCorp initially submitted its WMP Update for 2022 on May 06, 2022, and provided an overview of the WMP in a workshop overseen by Energy Safety on May 18, 2022. PacifiCorp's 2022 WMP Update did not satisfy the completeness requirements delineated in the Final 2022 Wildfire Mitigation Plan Update Guidelines. As a result, Energy Safety rejected the initial submission and a revised submission by PacifiCorp was resubmitted on July 18, 2022. Comments on the WMPs were due on August 15, 2022, and reply comments were due on August 22, 2022. Comments were provided by California Department of Fish and Wildlife (CDFW), the Public Advocate's Office (Cal Advocates), Green Power Institute (GPI), and Rural County representatives of California (RCRC). Comments generally called for additional detail, information, and monitoring of specific issues, such as risk assessment and mapping tools, pole replacement, undergrounding projects. However, none of the comments called for a rejection of the plan. Energy Safety evaluated these comments, concurred with some comments, and in some instances incorporated stakeholder input into the decision. [Res. SPD-12, pg. 4.]</p>	

	<p>Pleadings</p> <p>The GPI performed a review of the SMJUs' 2022 WMP Updates with a general focus on risk modeling and the reduction of green waste from vegetation management mitigations. Our comments focus on PacifiCorp and Liberty's 2022 WMPs, and secondarily address issues in the Bear Valley Electric Service (BVES) WMP. This is not, however, a reflection on the importance of holding BVES and their Wildfire Mitigation Plan to equally high standards. Based on our review we have substantial concerns regarding PacifiCorp's 2020–2021 performance and 2022 work plan and associated costs. We recommend issuing PacifiCorp a revision notice that addresses the disconnect between past versus proposed performance and costs. We provide further comments on the following topics [only bullet points pertinent to PacifiCorp included]:</p> <ul style="list-style-type: none"> • Equivocating language is a persistent issue in the SMJU WMPs. • PacifiCorp expenditures in 2021 and 2022 do not correlate well with work completed or planned. • SMJU's WMP-associated electric bill increases are much higher than IOU WMP customer increases. • SMJU lessons learned assessments are a plan weakness that suggests high-level directional planning for the WMP is somewhat uncertain. • SMJUs should clearly describe how they are working with other utilities to leverage existing data 	
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	<p>and ongoing studies relevant to their WMP research efforts.</p> <ul style="list-style-type: none">• PacifiCorp's completed pilot project descriptions are inadequate.• The SMJUs are relying heavily on the HFTD maps to guide risk mitigation planning efforts. They are also failing to analyze more granular risk and/or to use more granular risk findings to inform updates to the HFTD.• SMJUs may be oversimplifying their assessment of climate change effects on granular wildfire risk.• SMJUs fail to include tree species data in their risk modeling or vegetation management considerations.• SMJUs have not yet developed comprehensive or transparent quantification methods for wildfire consequence and should be required to do so in the next 3-year WMP cycle.• Comments on PacifiCorp's wildfire risk modeling.• Risk modeling and assessments do not include tree species.• A standard fire spread model duration should be set for wildfire consequence modeling and quantification. GPI supports a 24 h duration to encompass a full diurnal cycle.• PacifiCorp should be required to provide RSE for all wildfire mitigation activities in their 2023 WMP filing.	
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	<ul style="list-style-type: none">• PacifiCorp does not describe what near-miss data they are collecting.• PacifiCorp's additional PSPS impact reduction initiatives are reactive versus proactive risk reduction measures.• Liberty and PacifiCorp do not adequately take into account ingress or egress routes in their risk modeling or Grid Design and System Hardening plan.• PacifiCorp should assemble and store wildfire suppression equipment in their California territory.• PacifiCorp rolls many mitigations into its line rebuild program. It should describe how it addresses specific equipment risk outside of the Line Rebuild program.• All SMJUs should have a specific CC maintenance program that takes into consideration CC specific failure modes.• PacifiCorp's 2022 WMP does not address the fuels/slash end uses discussed and VM replacement programs mentioned in the workshop.• SMJUs should explain how they schedule and perform additional inspections and vegetation management in wildfire impacted areas. <p>[GPI Comments, 6/20/22, pgs. 1-3.]</p>	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: TURN, Mussey Grade, PAO, Will Abrams		
d. Intervenor's claim of non-duplication: This proceeding covers a wide variety of topics related to the state's program for wildfire mitigation. The Green Power Institute has been an active participant in the Commission's RPS and LTPP/IRP proceedings, and a number of related proceedings, including the wildfire mitigation proceeding, R.18-10-007. The Green Power Institute coordinated its efforts in this proceeding with other parties in order to avoid duplication of effort, and added significantly to the outcome of the Commission's deliberations through our own unique perspective. Some amount of duplication has occurred in this proceeding on all sides of contentious issues, but Green Power avoided duplication to the extent possible, and tried to minimize it where it was unavoidable.		

C. Additional Comments on Part II: (use line reference # or letter as appropriate)

#	Intervenor's Comment	CPUC Discussion

PART III: REASONABLENESS OF REQUESTED COMPENSATION
(to be completed by Intervenor except where indicated)

A. General Claim of Reasonableness (§ 1801 and § 1806):

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: The GPI is providing, in Attachment 2, a listing of all of the pleadings we provided in this Proceeding in the Wildfire Safety Division that are relevant to	

² The Office of Ratepayer Advocates was renamed the Public Advocate's Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

matters covered by this Claim, and in Attachment 3, a detailed breakdown of GPI staff time spent for work performed that was directly related to our substantial contributions to Resolutions SPD-7, SPD-8, SPD-9, SPD-11, and SPD-12.

The hours claimed herein in support of Resolutions SPD-7, SPD-8, SPD-9, SPD-11, and SPD-12 are reasonable given the scope of the Proceeding, and the strong participation by the GPI. GPI staff maintained detailed contemporaneous time records indicating the number of hours devoted to the matters settled by this Decision in this case. In preparing Attachment 3, Dr. Morris reviewed all of the recorded hours devoted to this proceeding, and included only those that were reasonable and contributory to the underlying tasks. As a result, the GPI submits that all of the hours included in the attachment are reasonable, and should be compensated in full.

Dr. Morris is a renewable energy analyst and consultant with more than 40 years of diversified experience and accomplishments in the energy and environmental fields. He is a nationally recognized expert on biomass and renewable energy, climate change and greenhouse-gas emissions analysis, integrated resources planning, and analysis of the environmental impacts of electric power generation. Dr. Morris holds a BA in Natural Science from the University of Pennsylvania, an MSc in Biochemistry from the University of Toronto, and a PhD in Energy and Resources from the University of California, Berkeley.

Dr. Morris has been actively involved in electric utility restructuring in California throughout the past three decades. He served as editor and facilitator for the Renewables Working Group to the California Public Utilities Commission in 1996 during the original restructuring effort, consultant to the CEC Renewables Program Committee, consultant to the Governor's Office of Planning and Research on renewable energy policy during the energy crisis years, and has provided expert testimony in a variety of regulatory and legislative proceedings, as well as in civil litigation.

Dr. Harrold has worked for the Green Power Institute (GPI) for a total of more than 10 years, as a Research Assistant from 2006 to 2008, and again as a Scientist from 2015 to present. Through her work with the GPI she has been engaged with the development of the Renewable Portfolio Standard program (RPS), the Integrated Resources Planning (IRP) proceeding, and the Wildfire Mitigation Plan (WMP) proceeding. Dr. Harrold earned a Ph.D. in geomicrobiology from the University of Washington, Department of Earth and Space Science in 2014.

Decision D.98-04-059 states, on pgs. 33-34, "Participation must be productive in the sense that the costs of participation should bear a reasonable relationship to the benefits realized through such participation. ... At a minimum, when the benefits are intangible, the customer should present information sufficient to justify a Commission finding that the overall benefits of a customer's participation will exceed a customer's costs." This proceeding is concerned with the development and approval of the wildfire mitigation plans of the wires utilities. The cost reductions and environmental benefits of the WMPs overwhelm the cost of our participation.

b. Reasonableness of hours claimed: The GPI made Significant Contributions to Resolutions SPD-7, SPD-8, SPD-9, SPD-11, and SPD-12 by actively participating in workshops and working groups, and providing a series of Commission filings on the various topics that were under consideration in the Proceeding and are covered by this Claim. Attachment 3 provides a detailed breakdown of the hours that were expended in making our Contributions. The hourly rates and costs claimed are reasonable and consistent with awards to other intervenors with comparable experience and expertise. The Commission should grant the GPI's claim in its entirety.	
c. Allocation of hours by issue: 1. 2023 WMP Compliance Process 20% 2. Review of 2022 Liberty Utilities WMP Update 15% 3. Review of 2022 PG&E WMP Update 25% 4. Review of 2022 BVES WMP Update 20% 5. Review of 2022 PacifiCorp WMP Update 20%	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
G. Morris	2022	82.00	465	See comment 1	38,130			
G. Morris	2023	7.50	485	See comment 1	3,638			
Z. Harrold	2022	246.00	285	See comment 2	70,110			
Z. Harrold	2023	10.25	300	See comment 2	3,075			
Subtotal: \$111,878						Subtotal: \$		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Subtotal: \$0						Subtotal: \$		

INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
G. Morris	2023	16.00	242.5	½ 2023 rate	3,880			
Subtotal: \$3,880						Subtotal: \$		
COSTS								
#	Item	Detail		Amount	Amount			
Subtotal: \$0					Subtotal: \$			
TOTAL REQUEST: \$115,758					TOTAL AWARD: \$			
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>								
ATTORNEY INFORMATION								
Attorney		Date Admitted to CA BAR ³		Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation			

C. Attachments Documenting Specific Claim and Comments on Part III:
(Intervenor completes; attachments not attached to final Decision)

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Allocation of effort by issue, list of pleadings
Attachment 3	Breakdown of hourly efforts by issue category

³ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

Attachments 4-8	Res. SPD-7, Res. SPD-8, Res. SPD-9, Res. SPD-11, and Res. SPD-12
Attachments 9-14	The six pleadings listed in Attachment 2
Attachment 15	NOI
Comment 1	The Commission has adopted a 3.31 percent adjustment for rates in the Market Rate Study for converting the 2021 to 2022 values, and 4.46 for converting the 2022 to 2023 values. These values can be found on the Escalation tab of the Hourly Rate Chart spreadsheet on the Commission's web site. We apply the 3.31 and 4.46 percent escalators to the approved 2021 hourly rate for Dr. Morris, which is \$450/hr (D.22-06-042), and round to the nearest 5 percent for both 2022 and 2023 per established Commission practice.
Comment 2	Dr. Harrold does not yet have an approved rate for 2021. GPI has requested a rate for Dr. Harrold for 2021 of \$280/hr. This rate request is pending in Claims filed in R.14-08-013 et. al. (filed 10/22/21), R.18-10-007 (filed 2/11/22), R.20-05-003 (filed 3/4/22), A.22-12-013 (filed 12/16/22), and R.18-07-003 (filed 2/10/23). Several of the requests include a request for Dr. Harrold for 2022 of \$285, based on applying the 3.31 percent adjustment as discussed above for comment 1, and the request in R.18-07-003 includes a request for Dr. Harrold for 2023 of \$300, based on applying the 4.46 percent adjustment as discussed above for comment 1. These are the rates we are requesting here as well. (Note that the request for 2022 should have been \$290, not \$285, based on the 3.31 percent adjustment factor, but we apparently miscalculated, and we standby the \$285 request that is already in multiple pending Claims.)

D. CPUC Comments, Disallowances, and Adjustments (CPUC completes)

Item	Reason

PART IV: OPPOSITIONS AND COMMENTS

Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (*see* § 1804(c))

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	
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If not:

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. **Green Power Institute** [has/has not] made a substantial contribution to **SPD-7, SPD-8, SPD-9, SPD-11 and SPD-12.**
2. The requested hourly rates for **Green Power Institute**'s representatives [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [, as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$_____.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. **Green Power Institute** shall be awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay **Green Power Institute** the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **Green Power Institute** their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent [industry type, for example, electric] revenue data shall be used."] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of **Green Power Institute**'s request, and continuing until full payment is made.
3. The comment period for today's decision [is/is not] waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	Resolutions SPD-7, SPD-8, SPD-9, SPD-11, and SPD-12		
Proceeding(s):	A.23-04-0xx		
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Green Power Institute	Apr. 4, 2023	\$115,758		N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Gregg	Morris	Expert	465	2022	
Gregg	Morris	Expert	485	2023	
Zoë	Harrold	Scientist	285	2022	
Zoë	Harrold	Scientist	300	2023	

(END OF APPENDIX)